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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIFFANY HEDGEPEETH, an individual,

Plaintiff,

v.

MEIBORG BROS, INC., an Illinois
Corporation; MEIBORG, INC., an Illinois
Corporation; JAMES RAY COX, an
individual; DOES I through X, inclusive;
ROE BUSINESS ENTITIES I through X,
inclusive,

Defendants.

CASE NO.: 2:24-cv-00045-CDS-MDC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
AND PRE-TRIAL DEADLINES
(SECOND REQUEST)**

In accordance with Local Rules of Practice for the United States District Court for the District of Nevada LR 26-3, Plaintiff, TIFFANY HEDGEPEETH, by and through her attorneys, Robert T. Eglet, Esq., Tracy A. Eglet, Esq., Brittney R. Glover, Esq., of the law firm of EGLET ADAMS EGLET HAM HENRIOD; and Defendants, MEIBORG BROS, INC., MEIBORG, INC. and JAMES RAY COX, by and through their attorneys, Mark R. Smith, Esq. and Robert L. Thompson, Esq. of the law firm of RESNICK & LOUIS, P.C., hereby stipulate and agree to an extension of all discovery and pre-trial deadlines by six (6) months. The parties propose the following revised discovery plan.

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I. DISCOVERY COMPLETED

On January 5, 2024, Defendants removed this case to Federal Court.

1. On February 2, 2024, the parties attended the FRCP 26(f) discovery conference.
2. Plaintiff served her Initial Disclosures on February 15, 2024.
3. Defendant produced their Initial Disclosures on February 16, 2024.
4. Plaintiff served her first supplemental disclosures on March 22, 2024.
5. Defendant Meiborg Bros, Inc. served its First Set of Interrogatories, Requests for Production and Requests for Admission to Plaintiff on February 16, 2024.
6. Plaintiff served responses to Defendant Meiborg Bros, Inc.'s First Set of Interrogatories and Requests for Admissions on April 5, 2024.
7. Plaintiff served her First Set of Interrogatories, Requests for Production and Requests for Admission to Defendant James Ray Cox on February 20, 2024.
8. Plaintiff served her First Set of Interrogatories, Requests for Production and Requests for Admission to Defendant Meiborg Bros, Inc. on February 20, 2024.
9. Plaintiff served her First Set of Interrogatories, Requests for Production and Requests for Admission on Defendant Meiborg, Inc. on February 20, 2024.

II. DISCOVERY THAT REMAINS TO BE COMPLETED

The parties believe the following discovery remains to be completed:

1. Obtain authorizations from Plaintiff to request medical and billing records;
2. Plaintiff's responses to Defendant Meiborg Bros, Inc.'s First Set of Requests for Production.
3. Defendant James Ray Cox's responses to Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission;
4. Defendant Meiborg Bros, Inc.'s responses to Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission;
5. Defendant Meiborg, Inc.'s responses to Plaintiff's First Set of Interrogatories, Requests for Production and Requests for Admission.

6. The FRCP 35 Examination of Plaintiff;
7. The deposition of Plaintiff;
8. The deposition of Defendant Meiborg Bros, Inc. FRCP 30(b)(6) Designee(s);
9. The deposition of Defendant Meiborg, Inc.'s FRCP 30(b)(6) Designee(s);
10. The deposition of Defendant James Ray Cox;
11. Depositions of Plaintiff's treating medical providers;
12. Any other party and witness depositions;
13. Designations of Initial Expert Witnesses;
14. Designations of Rebuttal Expert Witnesses;
15. Depositions of Expert Witnesses;
16. Additional discovery as the parties deem necessary.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED PRIOR TO THE CUT-OFF

This Honorable Court issued an Order on April 11, 2024 (ECF No. 21), vacating the pre-trial deadlines set forth in its March 26, 2024, Order (ECF No. 20) and temporarily stayed discovery for 60 days in light of the tragic events of April 8, 2024. The law firm of Eglet Adams Eglet Ham Henriod recently substituted in as counsel for Plaintiff in the place and stead of the Prince Law Group on May 30, 2024 (ECF No. 24). Due to the aforementioned, the parties have encountered delays proceeding with the discovery process in this matter. The parties believe a six (6) month extension of discovery and pre-trial deadlines is necessary and reasonable to allow Eglet, Adams, Eglet, Ham, Henriod, to review all materials to get up to speed on this case and for the parties to diligently and effectively continue their discovery efforts. The parties respectfully submit the reasons set forth above constitute good cause for this extension.

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IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

Description	Proposed Date
Amend Pleadings and Add Parties	December 26, 2024
Initial Expert Disclosures	January 27, 2025
Rebuttal Expert Disclosures	February 24, 2025
Close of Discovery	March 24, 2025
Dispositive Motions	April 22, 2025
Joint Pretrial Order	May 22, 2025

The Parties aver that this request for extension of discovery and pre-trial deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 18th day of June 2024.

RESNICK & LOUIS, P.C.

/s/ Robert L. Thompson

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DATED this 18th day of June 2024.

**EGLET ADAMS EGLET HAM
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/s/ Brittney R. Glover

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 6-20-24